

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MILTON CACERES MOLINA,

Plaintiff,

v.

WILLIAM JOYCE, in his official capacity as the Acting Field Office Director for the New York Field Office, U.S. Immigration & Customs Enforcement; TODD LYONS, in his official capacity as Acting Executive Associate Director, Enforcement and Removal Operations, ICE; KRISTI NOEM, in her official capacity as Secretary, U.S. Department of Homeland Security; PAMELA BONDI, in her official capacity as Attorney General of the United States,

Defendants.

Case No. 25-cv-1844

**NOTICE OF MOTION
FOR LEAVE TO FILE IN
FORMA PAUPERIS**

PLEASE TAKE NOTICE that upon the attached declaration of Plaintiff Milton Caceres Molina (“Plaintiff” or “Mr. Caceres Moline”) (ECF No. 2-1), sworn to on February 27, 2025, Mr. Caceres Molina will move this Court in the courthouse for the U.S. District Court for the Southern District of New York 500 Pearl St, New York, NY 10007, as soon as counsel can be heard, for an order pursuant to 28 U.S.C. § 1915(a) granting Mr. Caceres Molina’s application to proceed in the above captioned action *in forma pauperis*.

March 5, 2025
Brooklyn, NY

Respectfully Submitted,

/s/ Kevin Siegel

Kevin Siegel, Esq.
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